
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
:
v. :
: Mag. No. 19-3786
TORNIKE LUBYK :


I, Daniel De Rienzo, being duly sworn, state the following is true
and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Federal
Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.



Task Force Officer Daniel De Rienzo
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
July 11, 2019 in Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Impersonating a Federal Officer or Employee)

On or about July 8, 2019, in Bergen County, in the District of New Jersey and elsewhere, defendant

TORNIKE LUBYK

did knowingly and intentionally falsely assume and pretend to be an officer and employee acting under the authority of the United States and any department, agency, and officer thereof, and in such assumed and pretended character did act as such, that is, he falsely stated that he was an employee of the Federal Bureau of Investigation ("FBI"), represented that he was a law enforcement officer, and presented a purported FBI identification card, FBI badge, and a FBI security access card to certain local law enforcement officers during an encounter.

In violation of Title 18, United States Code, Section 912.

ATTACHMENT A

COUNT TWO

(Possession of Official Badge, Identification Card, or Other Insignia)

On or about July 8, 2019 in Bergen County, in the District of New Jersey and elsewhere, defendant,

TORNIKE LUBYK

did knowingly possess a badge, identification card, and other insignia, of the design prescribed by the head of a department or agency of the United States for use by any officer and employee thereof, that is, a Federal Bureau of Investigation ("FBI") identification card, an FBI badge, and an FBI security access card, except as authorized under regulations made pursuant to law.

In violation of Title 18, United States Code, Section 701.

ATTACHMENT B

I, Daniel De Rienzo, am a Task Force Officer with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about July 8, 2019, at approximately 10:21 p.m., a concerned motorist called 911 reporting that the driver of a black Chevy Tahoe, with a Connecticut license plate ("the Tahoe"), driving on a "Jersey highway," had activated emergency lights and attempted to pull over a vehicle on Route 17 in Allendale, New Jersey. The concerned motorist provided the vehicle's license plate number to the 911 dispatcher.

2. Minutes later, Paramus Police officers ("Paramus PD"), acting on the bulletin issued by the Allendale Police Department, observed the Tahoe traveling southbound on Route 17 in Paramus, New Jersey. Police dash camera footage shows that, as Paramus PD made a motor vehicle stop of the Tahoe, its driver activated the Tahoe's red and blue emergency lights.

3. During the stop, the male driver identified himself as Tornike Lubyk ("LUBYK") and presented Paramus PD with an apparent FBI badge, apparent FBI credentials, and an apparent FBI security access card. LUBYK repeatedly advised the officers that he was "with the FBI" and, specifically, that he worked for the FBI's "C-22" organized crime squad based in the Manhattan field office. LUBYK also advised Paramus PD that he was in possession of a firearm, located in an unspecified console in the vehicle.

4. After determining that LUBYK's driver's license was valid, that he had no criminal history or warrants, and that the vehicle was registered to him, and further being satisfied with the purported FBI credentials LUBYK provided, the officers released LUBYK from the scene without incident.

5. The investigation later revealed that LUBYK was not affiliated or employed by the FBI